Robert J. Brener, Esq.
EDWARDS ANGELL PALMER & DODGE LLP
Attorneys for Plaintiffs Ally Financial Inc. and Ally Bank
750 Lexington Ave.
New York, NY 10022
212-308-4411
rbrener@eapdlaw.com

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF NEW YORK

ALLY FINANCIAL INC. and ALLY BANK,

Docket No. 10-cv-4702 (NG)

Plaintiff,

Civil Action

VS.

NOTICE OF MOTION FOR CONTEMPT AND TO COMPEL DISCLOSURE

LEE DODGE, INC. and ROBERT A. LEE, JR.,

Document electronically filed

Defendants.

COUNSEL:

PLEASE TAKE NOTICE that as soon as counsel may be heard, the undersigned attorneys for plaintiffs Ally Financial Inc. and Ally Bank ("Ally") will apply to the United States District Court, Eastern District of New York, Magistrate Judge Go for an Order of contempt against Defendants for failing to comply with outstanding post-judgment discovery and violating Magistrate Judge Go's June 27, 2011 requiring compliance.

PLEASE TAKE FURTHER NOTICE that Ally shall rely upon the Declaration of Robert J. Brener, Esq. dated August 31, 2011, with attached exhibits, and a memorandum of law.

PLEASE TAKE FURTHER NOTICE that Ally hereby requests oral argument.

s/Robert J. Brener

Robert J. Brener, Esq.
EDWARDS ANGELL PALMER & DODGE LLP
750 Lexington Avenue
New York, NY 10022
(212) 308-4411
Attorneys for Plaintiffs

DATED: August 31, 2011